

**MANDATORY CHAMBERS COPY**

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Attorneys for Defendant  
 MONA DAGGETT

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF CALIFORNIA**

LANE BAULDRY,

Plaintiff,

v.

TOWN OF DANVILLE, COUNTY OF CONTRA  
 COSTA, CITY OF PIEDMONT, Government  
 Entities, MONA DAGGETT, CHRISTOPHER  
 BUTLER, DEPUTY STEPHEN TANABE,  
 DEPUTY TOM HENDERSON, SERGEANT  
 ANDY WELLS and DOES 1 to 50, inclusive,

Defendants.

Case No.: 3:12-cv-03943-CRB

**JOINT STIPULATION AND**  
**~~PROPOSED~~ ORDER REGARDING**  
**FURTHER EXTENSION OF TIME**  
**FOR DEFENDANT MONA DAGGETT**  
**TO ANSWER TO PLAINTIFF'S**  
**THIRD AMENDED COMPLAINT**

Plaintiff Lane Bauldry ("Plaintiff") and Defendant Mona Daggett ("Daggett") (collectively the "Stipulating Parties") hereby stipulate as follows:

WHEREAS, after the Court issued an order on April 23, 2013 granting in part and denying in part the motion to dismiss of defendants Sergeant Andrew Wells and the City of Piedmont, Plaintiff filed the "Third Amended Complaint for Damages, for Violations of Civil Rights and Other Wrongs" (hereinafter "TAC") on June 3, 2013;

WHEREAS, pursuant to joint stipulations including, most recently, the joint stipulation dated March 7, 2014 and this Court's related order which was signed on March 11, 2014 and filed with the court on March 12, 2014, Daggett's current deadline for answering the TAC is March 28, 2014;

1 WHEREAS, since Plaintiff filed TAC, the Stipulating Parties have continued to discuss this  
2 action and have agreed to extend the deadline for Daggett to answer the TAC to, and including,  
3 April 25, 2014;

4 WHEREAS, an extension of time for answering the TAC is supported by good cause as it  
5 will not prejudice any party to this action and does not interfere with any court-mandated deadlines;

6 THEREFORE, the Stipulating Parties request that the Court extend the deadline for Daggett  
7 to answer Plaintiff's TAC from March 28, 2014 to, and including, April 25, 2014.

8 **IT IS SO STIPULATED.**

9  
10 Dated: March 28, 2014

**DUANE MORRIS LLP**

11  
12 By: /s/ Allegra A. Jones

13 Allegra A. Jones  
14 Attorneys for Defendant  
MONA DAGGETT

15 Dated: March 28, 2014

**THE HALEY LAW OFFICES**

16  
17 By: /s/ Matthew Haley

18 Matthew Haley  
19 Attorneys for Plaintiff  
LANE BAULDRY

20 ATTESTATION: Pursuant to Civil L.R. 5-1(i)(3), the filer attests that concurrence in the  
21 filing of this document has been obtained from each of the other signatories thereto.

22 **ORDER**

23  
24 **IT IS SO ORDERED.**

25  
26 Dated: April 2, 2014

27   
28 JUDGE OF THE U.S. DISTRICT COURT